

3. Defendants remain hopeful it will be possible to resolve this case without additional expenditure of judicial resources – particularly, as it pertains to the recently filed motion for preliminary injunction.

4. Defendants anticipate that mediation will occur by August 31, 2019.

5. In case mediation proves unsuccessful, Defendants request reasonable time to engage in discovery, including deposition of the experts cited in Plaintiff's Motion for Preliminary Injunction, before filing suggestions in opposition to Plaintiffs' Motion.

6. To further address the issue of scheduling, Defendants respectfully request that the Court set a hearing on Plaintiffs' Motion on or after October 23, 2019, pursuant to the Court's availability.¹

7. In the event that Court wishes to proceed with scheduling, Defendants, based upon the need for discovery and other existing conflicting professional and personal obligations, propose the following scheduling order as it relates to Plaintiffs' Motion:

- a. Plaintiffs will make the following experts available for deposition by August 21, 2019:

¹ Plaintiffs have communicated to Defendants that they will not consent to any hearing date later than the week of July 29, 2019. Counsel for Corizon respectfully request that the Court take notice that Defendants' counsel is unavailable for a hearing on Plaintiffs' Motion during the weeks of July 29, 2019 to August 3, 2019 and October 7, 2019 to October 11, 2019, due to preplanned and prepaid out-of-state travel.

- i. Dr. Richard Moseley;
 - ii. Dr. Blair Thedinger; and
 - iii. Dr. Jody Olsen.
 - b. Defendants must file their suggestions in opposition to Plaintiffs' Motion by September 19, 2019.
 - c. Plaintiffs must file any reply in support Plaintiffs' Motion and a list of witnesses and exhibits for the hearing on Plaintiff's Motion by October 3, 2019.
 - d. Defendants must file their list(s) of witnesses and exhibits for the hearing on Plaintiffs' Motion by October 13, 2019.
8. Should the Court need additional information or clarification regarding anything contained herein, Defendants request a status conference with the Court on or before June 28, 2019.

Respectfully submitted on this the 25th day of June, 2019.

/s/ William R. Lunsford
William R. Lunsford
One of the Attorneys for Defendant
Corizon, LLC

William R. Lunsford
Matthew B. Reeves
MAYNARD, COOPER & GALE, P.C.
655 Gallatin Street
Huntsville, Alabama 35801
Telephone: (256) 551-0171

Facsimile: (256) 512-0119
blunsford@maynardcooper.com
mreeves@maynardcooper.com

Dwight A. Vermette
ECKENRODE-MAUPIN
11477 Olde Cabin Road
Suite 110
St. Louis, Missouri 63141
Telephone: (314) 726-6670
Facsimile: (314) 726-2106
dav@eckenrode-law.com

/s/ David D. Dean
*One of the Attorneys for Defendants
Missouri Department of Corrections,
Adrienne Hardy and Anne L. Precythe*

David D. Dean
Jennifer Baumann
OFFICE OF THE ATTORNEY GENERAL
815 Olive Street
St. Louis, Missouri 63101
Telephone: (314) 340-7861
Facsimile: (314) 340-7029
john.taylor@ago.mo.gov
jennifer.baumann@ago.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following attorneys of record in this matter via the Court's CM/ECF system on June 25, 2019:

Anthony E. Rothert
Gillian R. Wilcox
Jessie Steffan
Omri E. Praiss
**AMERICAN CIVIL LIBERTIES
UNION OF MISSOURI FOUNDATION**
906 Olive Street
Suite 1130
St. Louis, Missouri
Telephone: (314) 652-3114
Facsimile: (314) 652-3112
trothert@aclu-mo.org
gwilcox@aclu-mo.org
jsteffan@aclu-mo.org
opraiss@aclu-mo.org

Meghan C. Cleary
Amelia Igo Pelly Frenkel
Anastasia McLetchie Pastan
Elizabeth Lynn Henthorne
WILKINSON WALSH & ESKOVITZ
11601 Wilshire Boulevard
Suite 600
Los Angeles, California 90025
Telephone: (424) 291-9669
Facsimile: (202) 847-4005
mcleary@wilkinsonwalsh.com
afrenkel@wilkinsonwalsh.com
apastan@wilkinsonwalsh.com
bhenthorne@wilkinsonwalsh.com

Megan G. Crane
Amy E. Breihan
**MACARTHUR JUSTICE CENTER AT
ST. LOUIS**
3115 South Grand Blvd.
Suite 300
St. Louis, Missouri 63118
Telephone: (314) 254-8541
megan.crane@macarthurjustice.org
amy.breihan@macarthurjustice.org

/s/ William R. Lunsford

Of Counsel